<u>REMARKS</u>

In the Final Office Action, the Examiner rejects claims 1-7, 9-11, 13, 19-29, 31, 34, 42, and 45-47 under 35 U.S.C. § 103(a) as being unpatentable over DAHLEN (U.S. Patent No. 5,870,454) in view of AKTAS et al. (U.S. Patent Application Publication No. 2003/0028604); rejects claims 14, 15, 32, and 33 under 35 U.S.C. § 103(a) as being unpatentable over DAHLEN and AKTAS et al. in view of TULLIS et al. (U.S. Patent No. 5,802,314); rejects claims 16, 17, and 35 under 35 U.S.C. § 103(a) as being unpatentable over DAHLEN and AKTAS et al. in view of RODRIQUEZ et al. (U.S. Patent Application Publication No. 2002/0067806); rejects claims 18, 36, and 43 under 35 U.S.C. § 103(a) as being unpatentable over DAHLEN and AKTAS et al. in view of FORTMAN et al. (U.S. Patent No. 5,987,100); rejects claim 44 under 35 U.S.C. § 103(a) as being unpatentable over DAHLEN and AKTAS et al. in view of FORTMAN et al. and RODRIQUEZ et al.; rejects claims 37-40, 48, and 49 under 35 U.S.C. § 103(a) as being unpatentable over DAHLEN in view of TULLIS et al.; and rejects claim 41 under 35 U.S.C. § 103(a) as being unpatentable over DAHLEN and TULLIS et al. in view of AKTAS et al. The rejections are traversed for at least the following reasons.[1]

By this Amendment, Applicants propose amending claims 1, 3, 4, 19, 37, and 48 to improve form, and canceling claim 2 without prejudice or disclaimer. No new matter

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[1] As Applicants' remarks with respect to the Examiner's rejections are sufficient to overcome these rejections, Applicants' silence as to assertions by the Examiner in the Office Action or certain requirements that may be applicable to such rejections (e.g., whether a reference constitutes prior art, motivation to combine references, etc.) is not a concession by Applicants that such assertions are accurate or such requirements have been met, and Applicants reserve the right to analyze and dispute such assertions/requirements in the future.

is added by way of the Amendment. Claims 1, 3-7, 9-11, 14-29, and 31-49 will remain

pending upon entry of the Amendment.

REJECTION UNDER 35 U.S.C. § 103 BASED ON DAHLEN AND AKTAS ET AL.

Claims 1, 3-7, 9-11, 13, 19-29, 31, 34, 42, and 45-47 stand rejected under 35

U.S.C. § 103(a) as allegedly unpatentable over DAHLEN in view of AKTAS et al.

Applicants respectfully traverse the rejection.

Claim 1, as amended, is directed to a method for delivering a message to a

receiving party. The method comprises generating a user profile for the receiving party

that includes user-defined criteria and delivery data specified by the receiving party;

receiving a message and one or more message attachments intended for the receiving

party, the message being received in a source message format and the one or more

message attachments being received in a source attachment format; determining whether

the message should be delivered to the receiving party based one or more of the user-

defined criteria; translating the message from the source message format to message text

and the one or more message attachments from the source attachment format into

attachment text; converting the message text and the attachment text to an audible

message when the message should be delivered to the receiving party; initiating a

telephony call to the receiving party at a pre-determined date or time based on the

delivery data; and delivering the audible message to the receiving party during the

telephony call. This combination of features is not disclosed or suggested by DAHLEN

and AKTAS et al., whether taken alone or in any reasonable combination.

For example, neither DAHLEN nor AKTAS et al. discloses or suggests converting message text and attachment text to an audible message when a message should be delivered to a receiving party, as recited in claim 1. The Examiner asserts that DAHLEN discloses this feature, citing col. 6, lines 5-24; and col. 9, lines 17-18 and 26-45 of DAHLEN for support (Final Office Action, page 4). Applicants respectfully submit that the Examiner is misconstruing the features of Applicants' claim 1.

Claim 1 recites converting message text, which has been obtained by translating a message from a source message format to the message text, and attachment text, which has been obtained by translating one or more message attachments from a source attachment format to the attachment text, to an audible message when the message should be delivered to the receiving party. These features are not disclosed or remotely suggested by DAHLEN as modified by AKTAS et al., even assuming, for the sake of argument, that the Examiner is accurate, at p. 5 of the Final Office Action, that AKTAS et al. discloses translating one or more message attachments from a source attachment format to the attachment text (a point that Applicants do not concede).

At col. 6, lines 5-24, DAHLEN discloses:

> At step 236 the prompter & collector inquires whether calling party 22 wishes to attach a file. File attachment means that calling party 22 wishes to include in the message a copy of a standard message. The standard message can be one or more routine messages which are prone to use by many calling parties and hence generally available or, in a more sophisticated embodiment, can be one of the previous message of this particular calling party which has been stored and identified in SDP 50 for calling party 22. If file attachment is not desired, processing continues with the steps shown in FIG. 2B. If file attachment is desired, the prompter & collector permits calling party 22 to select the prestored message at step 238. In this regard, prompter & collector can either simply request calling party 22 to enter an identifier or code for the

prestored message, or (at subscriber option) can play a repertoire of prestored messages and permit calling party 22 to select therefrom. In addition, after the prestored message (e.g., attached file) has been selected, the prompter & collector inquires at step 240 whether the attached file needs to be translated from a first language to a second language.

In this section, DAHLEN discloses a number of steps in connection with Fig. 2 which depicts a speech to text conversion service (col. 3, lines 33-36) in which a calling party 22 without a texting device (col. 8, lines 32-34) interacts with the service (col. 2, lines 20-23). At steps 236 and 238, if calling party 22 elects to attach a file to a message, calling party 22 may opt to have a repertoire of prestored messages played, from which calling party 22 may make a selection. DAHLEN discloses that the prompter & collector inquires of calling party 22 whether the attached file selected needs to be translated from a first language to a second language. Applicants submit that DAHLEN's disclosure of calling party's 22 selection of an attached message from the playing of prestored messages and indication that the attached message needs language translation, is in no way equivalent to converting message text, which has been obtained by translating the message from the source message format to the message text, and attachment text, which has been obtained by translating one or more message attachments from a source attachment format to the attachment text, to an audible message when the message should be delivered to the receiving party, as required by claim 1.

At col. 9, lines 16-18 and 26-45, DAHLEN discloses:

In the embodiment illustrated in FIG. 4, speech/text converter 80 performs conversion of a text message to a speech message.
*   *   *
The network of FIG. 4, in addition to providing the speech to text conversion described with reference to FIG. 1, for example, also provides a service of converting text messages to speech messages. In brief, calling

party 22 dials the directory number for the text-to-speech conversion
service using a telephone. Calling party 22 is connected to the service via
SCP 30. SCP 30 sets up a dialogue with the calling party, with the calling
party responding either by voice or DTMF. In the course of the dialogue,
calling party 22 selects from one of a plurality of prestored text messages.
Further, calling party 22 selects a distribution list and (optionally) a time
of delivery for the messages. The establishment and editing of distribution
lists are understood with reference to preceding discussion. Upon
completion of the dialogue, SCP 30 enables conversion of the text
message to voice and (at the time selected by the calling party) arranges
delivery of the voice message to the called party(ies) on the distribution
list. Delivery of the voice messages is to phone-based networks 110.

In these sections, DAHLEN discloses an embodiment in which a calling party 22 selects

one of a number of prestored text messages and the selected text message is converted to

voice and delivered as a voice message to the called party(ies). DAHLEN does not

disclose or remotely suggest that the prestored text message was obtained by translating a

message or one or more message attachments from a source format to

message/attachment text, as would be required by claim 1. Thus, nowhere in this section,

or elsewhere, does DAHLEN disclose or suggest converting message text, which has

been obtained by translating the message from the source message format to the message

text, and attachment text, which has been obtained by translating one or more message

attachments from a source attachment format to the attachment text, to an audible

message when the message should be delivered to the receiving party, as required by

claim 1. AKTAS et al. also fails to disclose or suggest these features.

Furthermore, DAHLEN and AKTAS et al., whether taken alone or in any

reasonable combination, do not disclose or suggest initiating a telephony call to a

receiving party at a pre-determined date or time based on delivery data specified by the

receiving party, as recited by claim 1. The Examiner asserts that this feature is disclosed

by DAHLEN, at col. 7, line 45 – col. 8, line 29; col. 8, lines 42-53; col. 9, lines 61-67; and col. 10, lines 11-48 (Final Office Action, p. 4). Applicants respectfully disagree.

Applicants have carefully studied each of the sections of DAHLEN identified by the Examiner and respectfully submit that none of the sections, or any other portion of the DAHLEN disclosure, supports the Examiner's assertion. To the contrary, DAHLEN discloses permitting a calling party to select a target time for delivery of a message to a called party. See, e.g., col. 9, lines 61-67 of DAHLEN, which discloses:

> As part of the dialogue, prompter & collectors 70, 72 provide a series of audible menus. The menus include menus to select a desired prestored text message; menus to select a distribution list of called party(ies) to whom the message is to be delivered; and, a menu (optional) which permits calling party 22 to select delivery of the message either immediately or at a target time selected by calling party 22.

Thus, nowhere in this section or elsewhere does DAHLEN disclose or suggest initiating a telephony call to a receiving party at a pre-determined date or time based on delivery data specified by the receiving party, as required by claim 1. AKTAS et al. also does not disclose or suggest this feature.

Claims 3-7, 9-11, and 13 depend from claim 1 and are, therefore, patentable over DAHLEN and AKTAS et al. for at least the reasons given with respect to claim 1.[2]

Independent claims 19 and 20 recite features similar to, but possibly different in scope from features recited in claim 1. Claims 19 and 20 are, therefore, patentable over DAHLEN or AKTAS et al., whether taken alone or in any reasonable combination, for at least reasons similar to reasons given with respect to claim 1.

Claims 21-29, 31, and 34 depend from claim 20 and are, therefore, patentable over DAHLEN and AKTAS et al., whether taken alone or in any reasonable combination, for at least the reasons given with respect to claim 20.

Independent claim 42 recites a method for providing enhanced message services. The method comprises, prior to monitoring messages, interacting with a user to generate a user profile that identifies at least one message criterion that indicates when the messages should be delivered to the user; monitoring a message server for arrival of new messages intended for the user; and processing the new messages, including: determining whether the new messages should be delivered to the user based on the user profile, translating the new messages from a source format to a text format, and converting the new messages from the text format to an audible format, as audible messages, when the new messages should be delivered to the user. The method also comprises delivering the audible messages to the user based on the at least one message criterion, including: initiating a telephony call to the user, and presenting the audible messages to the user during the telephony call. This combination of features is not disclosed by DAHLEN and AKTAS et al., whether taken alone or in any reasonable combination.

For example, DAHLEN and AKTAS et al., whether taken alone or in any reasonable combination, do not disclose or suggest interacting with a user to generate a user profile that identifies at least one message criterion that indicates when the messages should be delivered <u>to the user</u>, as required by claim 42. The Examiner asserts that

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[2] As Applicants' remarks with respect to the base independent claims are sufficient to overcome the Examiner's rejections of all claims dependent therefrom, Applicants' silence as to the Examiner's assertions with respect to dependent claims is not a concession by Applicants to the Examiner's assertions as to these claims, and Applicants reserve the right to analyze and dispute such assertions in the future.

DALEN discloses, "prior to monitoring messages, interacting with a caller to generate a

user profile that identifies at least one message criterion that indicates when the messages

should be delivered to the user," citing col. 6, lines 51-65, as support (Final Office

Action, p. 8). The Examiner, also at p. 8 of the Final Office Action, admits that

DAHLEN does not disclose or suggest "interacting with a user to generate a user profile

that identifies at least one message criterion." The Examiner asserts that this undisclosed

feature of DAHLEN is nevertheless disclosed at paragraphs 36, 38, 39, and 45 of

AKTAS et al. (Final Office Action, p. 8). Applicants respectfully submit that neither

DAHLEN nor AKTAS et al. discloses or suggests interacting with a user to generate a

user profile that identifies at least one message criterion that indicates when the messages

should be delivered to the user, as required by claim 42.

DAHLEN, at col. 6, lines 51-67, discloses:

> Thus, at step 252, calling party 22 can indicate a particularly timed distribution of the message rather than normal distribution. In response, at step 254 the prompter & collector permits calling party 22 to enter the predetermined call time or target time for the distribution. In entering the target time at step 254, calling party 22 may simply enter or speak the digits of the target time, or may request a menu of routing times and respond as desired to the menu. The target time information gleaned at step 254 is included in the current call record for calling party 22.
> Upon completion either of step 254 or in the case the flag time_list is not set at step 250, step 270 is executed. At step 270, the service prepares prompts and receives the voice message from calling party 22. Step 270 of FIG. 2B shows the prompter & collector prompting calling party 22 to record (e.g., to speak) his/her message (after a predetermined ready signal [e.g., "beep"]).

This portion of DAHLEN discloses that the prompter & collector permits calling party 22

to enter the predetermined call time or target time for the distribution of the calling

party's 22 message. Thus, nowhere in this portion, or elsewhere, does DAHLEN disclose

or suggest interacting with a user to generate a user profile that identifies at least one

message criterion that indicates when the messages should be delivered to the user, as

required by claim 42.

After careful study of the portions of AKTAS et al. relied upon by the Examiner,

Applicants respectfully submit that AKTAS et al. also does not disclose or suggest

interacting with a user to generate a user profile that identifies at least one message

criterion that indicates when the messages should be delivered to the user, as required by

claim 42. Paragraphs 45-48 of AKTAS et al., for example, disclose:

> Data is transmitted to the pager based on a user defined data selection criteria which is stored as a template in the system profile for the user. The data available for selection includes sender same [sic], time, summary, message priority, un-summarized text, and other fields as available.
> The user describes a template that indicates the information desired and the number of characters of each field desired. For example:
> "From %SENDER% at %TIME%: %100SUMMARY%"
> indicates that the user wants a string that includes the entire sender name, the received time and the first 100 characters of the summary to appear on his pager.

This portion of AKTAS et al. merely discloses that the particular data from a message to

be transmitted to a user's pager may be user defined data selection criteria (e.g., sender

name, the received time, summary, message priority, un-summarized text, etc.) which is

stored as a template in the system profile for the user. Nowhere in this portion, or

elsewhere, does AKTAS et al. disclose or suggest interacting with a user to generate a

user profile that identifies at least one message criterion that indicates when the messages

should be delivered to the user, as required by claim 42.

DAHLEN and AKTAS et al., whether taken alone or in any reasonable combination, also do not disclose or suggest translating new messages from a source format to a text format, and converting the new messages from the text format to an audible format, as audible messages, when the new messages should be delivered to the user, as further recited by claim 42, for at least the reasons given with respect to claim 1.

For at least these reasons, claim 42 is patentable over DAHLEN and AKTAS et al., whether taken alone or in any reasonable combination.

Claims 45-47 depend from claim 42 and are, therefore, patentable over DAHLEN and AKTAS et al., whether taken alone or in any reasonable combination, for at least the reasons given with respect to claim 42.

Accordingly, Applicants respectfully request reconsideration and withdrawal of the rejection of claims 1, 3-7, 9-11, 13, 19-29, 31, 34, 42, and 45-47 under 35 U.S.C. § 103 based on DAHLEN and AKTAS et al.

*REJECTION UNDER 35 U.S.C. § 103 BASED ON
DAHLEN, AKTAS ET AL., AND TULLIS ET AL.*

Claims 14, 15, 32, and 33 stand rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over DAHLEN and AKTAS et al. in view of TULLIS et al. Applicants respectfully traverse the rejection.

Claims 14, 15, 32, and 33 variously depend from claims 1 and 20. TULLIS et al. does not remedy the above-identified deficiencies in the disclosures of DAHLEN and AKTAS et al. with respect to claims 1 and 20. Thus, claims 14, 15, 32, and 33 are patentable over DAHLEN, AKTAS et al., and TULLIS et al., whether taken alone or in

any reasonable combination, for at least the reasons given with respect to claims 1 and 20.

Accordingly, Applicants respectfully request reconsideration and withdrawal of the rejection of claims 14, 15, 32, and 33 under 35 U.S.C. § 103 based on DAHLEN, AKTAS et al., and TULLIS et al.

REJECTION UNDER 35 U.S.C. § 103 BASED ON DAHLEN, AKTAS ET AL., AND RODGRIGUEZ ET AL.

Claims 16, 17, and 35 stand rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over DAHLEN and AKTAS et al. in view of RODGRIGUEZ et al. Applicants respectfully traverse the rejection.

Claims 16, 17, and 35 variously depend from claims 1 and 20. RODGRIGUEZ et al. does not remedy the above-identified deficiencies in the disclosures of DAHLEN and AKTAS et al. with respect to claims 1 and 20. Thus, claims 16, 17, and 35 are patentable over DAHLEN, AKTAS et al., and RODGRIGUEZ et al., whether taken alone or in any reasonable combination, for at least the reasons given with respect to claims 1 and 20.

Accordingly, Applicants respectfully request reconsideration and withdrawal of the rejection of claims 16, 17, and 35 under 35 U.S.C. § 103 based on DAHLEN, AKTAS et al., and RODGRIGUEZ et al.

REJECTION UNDER 35 U.S.C. § 103 BASED ON DAHLEN, AKTAS ET AL., AND FORTMAN ET AL.

Claims 18, 36, and 43 stand rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over DAHLEN and AKTAS et al. in view of FORTMAN et al. Applicants respectfully traverse the rejection.

Claims 18, 36, and 43 variously depend from claims 1, 20, and 42. FORTMAN et al. does not remedy the above-identified deficiencies in the disclosures of DAHLEN and AKTAS et al. with respect to claims 1, 20, and 42. Thus, claims 18, 36, and 43 are patentable over DAHLEN, AKTAS et al., and FORTMAN et al., whether taken alone or in any reasonable combination, for at least the reasons given with respect to claims 1, 20, and 42.

Accordingly, Applicants respectfully request reconsideration and withdrawal of the rejection of claims 18, 36, and 43 under 35 U.S.C. § 103 based on DAHLEN, AKTAS et al., and FORTMAN et al.

REJECTION UNDER 35 U.S.C. § 103 BASED ON DAHLEN, AKTAS ET AL., FORTMAN ET AL., AND RODRIQUEZ ET AL.

Claim 44 stands rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over DAHLEN and AKTAS et al. in view of FORTMAN et al. and RODRIQUEZ et al. Applicants respectfully traverse the rejection.

Claim 44 depends from claim 43. RODRIQUEZ et al. does not remedy the above-identified deficiencies in the disclosures of DAHLEN, AKTAS et al., and FORTMAN et al. with respect to claim 43. Thus, claim 44 is patentable over DAHLEN, AKTAS et al., FORTMAN et al., and RODRIQUEZ et al., whether taken alone or in any reasonable combination, for at least the reasons given with respect to claims 43.

Accordingly, Applicants respectfully request reconsideration and withdrawal of the rejection of claim 44 under 35 U.S.C. § 103 based on DAHLEN, AKTAS et al., FORTMAN et al., and RODRIQUEZ et al.

REJECTION UNDER 35 U.S.C. § 103 BASED ON DAHLEN AND TULLIS ET AL.

Claims 37-40, 48, and 49 stand rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over DAHLEN in view of TULLIS et al. Applicants respectfully traverse the rejection.

Independent claim 37, as amended, is directed to computer-readable medium that stores instructions executable by at least one computer to perform a method for presenting a message to a receiving party. The computer-readable medium comprises instructions for obtaining a message intended for the receiving party, the message including one or more message attachments; instructions for determining whether the one or more message attachments are convertible into a target format; instructions for translating the one or more message attachments into the target format when the one or more message attachments are convertible into the target format; instructions for generating a description of the one or more message attachments when the one or more message attachments are not convertible into the target format; instructions for initiating a voice call to the receiving party at a predetermined date and time specified by the receiving party; and instructions for presenting the message with the one or more attachments or the generated description to the receiving party during the voice call. This combination of features is not disclosed by DAHLEN and TULLIS et al., whether taken alone or in any reasonable combination.

For example, DAHLEN does not disclose or suggest instructions for initiating a voice call to a receiving party at a predetermined date and time specified by the receiving party, as required by claim 37, for at least reasons similar to reasons given with respect to

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claim 1. TULLIS et al. also does not disclose or suggest instructions for initiating a voice call to a receiving party at a predetermined date and time specified by the receiving party. Thus, claim 37 is patentable over DAHLEN and TULLIS et al., whether taken alone or in any reasonable combination.

Claims 38-40 depend from claim 37 and are, therefore, patentable over DAHLEN and TULLIS et al., whether taken alone or in any reasonable combination, for at least reasons given with respect to claim 37.

Independent claim 48, as amended, is directed to an automated method for delivering a message to a receiving party. The method comprises receiving a message intended for the receiving party, the message including a message portion and one or more attachments in a source format; determining whether the one or more attachments can be converted to a target format; translating the one or more attachments into the target format when the one or more attachments can be converted to the target format; generating a description of the one or more attachments when the one or more attachments cannot be converted to the target format; converting the message portion to an audible message; initiating a telephony call to a telephony device associated with the receiving party at a pre-determined date and time specified by the receiving party; and delivering the audible message and the one or more attachments or the generated description to the receiving party during the telephony call. This combination of features is not disclosed by DAHLEN and TULLIS et al., whether taken alone or in any reasonable combination.

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For example, DAHLEN does not disclose or suggest initiating a telephony call to a telephony device associated with the receiving party at a pre-determined date and time specified by the receiving party, as required by claim 48, for at least reasons similar to reasons given with respect to claim 1. TULLIS et al. also does not disclose or suggest initiating a telephony call to a telephony device associated with the receiving party at a pre-determined date and time specified by the receiving party. Thus, claim 48 is patentable over DAHLEN and TULLIS et al., whether taken alone or in any reasonable combination.

Claim 49 depends from claim 48 and is, therefore, patentable over DAHLEN and TULLIS et al., whether taken alone or in any reasonable combination, for at least the reasons given with respect to claim 48.

Accordingly, Applicants respectfully request reconsideration and withdrawal of the rejection of claims 37-40, 48, and 49 under 35 U.S.C. § 103 based on DAHLEN and TULLIS et al.

*REJECTION UNDER 35 U.S.C. § 103 BASED ON
DAHLEN, TULLIS ET AL., AND AKTAS ET AL.*

Claim 41 stands rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over DAHLEN and TULLIS et al. in view of AKTAS et al. Applicants respectfully traverse the rejection.

Claim 41 depends from claim 37. AKTAS et al. does not remedy the above-identified deficiencies in the disclosures of DAHLEN and TULLIS et al. with respect to claim 37. Thus, claim 41 is patentable over DAHLEN, TULLIS et al., and AKTAS et al.,

whether taken alone or in any reasonable combination, for at least the reasons given with respect to claims 37.

Accordingly, Applicants respectfully request reconsideration and withdrawal of the rejection of claim 37 under 35 U.S.C. § 103 based on DAHLEN, TULLIS et al., and AKTAS et al.

CONCLUSION

In view of the foregoing amendments and remarks, Applicants respectfully request the Examiner's reconsideration of the application and the timely allowance of pending claims 1, 3-7, 9-11, 14-29, and 31-49.

Applicants respectfully request that this Amendment under 37 C.F.R. § 1.116 be entered by the Examiner, placing claims 1, 3-7, 9-11, 14-29, and 31-49 condition for allowance. Applicants submit that the proposed amendments do not raise new issues or necessitate the undertaking of any additional search of the art by the Examiner, since all of the elements and their relationships claimed were either earlier claimed or implied in the claims as examined. Therefore, this Amendment should allow for immediate action by the Examiner. Further, Applicants submit that the entry of this Amendment would place the application in better form for appeal, should the Examiner dispute the patentability of the pending claims.

If the Examiner does not believe that all pending claims are now in condition for allowance, the Examiner is urged to contact the undersigned to expedite prosecution of this application.

To the extent necessary, a petition for an extension of time under 37 C.F.R. §

1.136 is hereby made. Please charge any shortage in fees due in connection with the

filing of this paper, including extension of time fees, to Deposit Account No. 50-1070

and please credit any excess fees to such deposit account.

Respectfully submitted,

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